

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE	:	
PLAYERS' CONCUSSION INJURY	:	
LITIGATION	:	

Kevin Turner and Shawn Wooden, <i>on behalf</i>	:	No. 2:12-md-2323-AB
<i>of themselves and others similarly situated,</i>	:	

Plaintiffs,	:	MDL No. 2323
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vs.	:	
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National Football League and NFL	:	Hon. Anita B. Brody
Properties LLC, successor-in-interest to NFL	:	
Properties Inc.	:	

Defendants.	:	
	:	
	:	
	:	
	:	

THIS DOCUMENTS RELATES TO:
ALL ACTIONS

**SUPPLEMENTAL DECLARATION OF RAUL J. SLOEZEN, ESQUIRE IN FURTHER
OPPOSITION TO CO-LEAD CLASS COUNSEL'S MOTION TO (1) DIRECT CLAIMS
ADMINISTRATOR TO WITHHOLD ANY PORTIONS OF CLASS MEMBER
MONETARY AWARDS PURPORTEDLY OWED TO CERTAIN THIRD-PARTY
LENDERS AND CLAIMS SERVICES PROVIDERS AND (2) DIRECT DISCLOSURE
TO THE CLAIMS ADMINISTRATOR OF EXISTENCE OF CLASS MEMBE
AGREEMENTS WITH ALL THIRD PARTIES**

I, Raul J. Sloezen, hereby declare and state as follows:

1. I am the New York and New Jersey attorney for the Proposed Intervenor, Cash4Cases, Inc. ("C4C"), Atlas Legal Funding, LLC, ("ALF") Atlas Legal Funding I, LP, ("Atlas I") Atlas Legal Funding II, LP ("Atlas II") and Atlas Legal Funding III, LP, ("Atlas III")

(collectively, “ALF”, Atlas I”, “Atlas II” and “Atlas III” are referred to as “Atlas”) and I have been admitted *pro hac vice* in this matter. I have personal knowledge and/or information of the facts set forth in this Declaration based upon a review of the file maintained by my office, by Atlas and a review of public records.

2. This Declaration is submitted in opposition to the Reply Declaration of Christopher A. Seeger, Esq. (ECF 9113-1)
3. The following attached Exhibits to the Sur-Reply are true and accurate copies of the documents contained the file maintained by my office on behalf of C4C and Atlas and records obtained from public records.
4. **Exhibit 8 – Contract dated October 15, 2014, between Atlas II and Timothy Meamber.** This Contract is a true and accurate copy of the contract maintained by Atlas and my office and was provided Mr. Seeger in the course of discovery, Bates # ATLAS NFL 001147-00158.
5. **Exhibit 9 – LawCash Check #154135 to Atlas Funding regarding Timothy Meamber.** This check is a true and accurate copy of the check received from LawCash and is in the file maintained by Atlas and by my office.
6. **Exhibit 10 – Esquire Bank Letter dated September 4, 2012, regarding Christopher A. Seeger.** This letter was obtained by going on to the following website, https://www.esquirebank.com/custom/fi/esquirebank/fb/disclosure/Shareholder-Letter_9.4.12.pdf.
7. **Exhibit 11 – Printout from Law Cash’s website regarding the Dennis Shields.** This information was obtained by going on to the following website maintained by LawCash. <https://www.lawcash.net/about-us/team/>.


8. **Exhibit 12 – Printout from Esquire Bank’s website regarding Dennis Shields.** This information was obtained by going on to the following website maintained by Esquire Bank. <https://www.esquirebank.com/about-us/board-of-directors.html>.
9. **Exhibit 13 – Executive Profile of Selig A. Zises.** This profile was obtained by going on to the following website,
<https://www.bloomberg.com/research/stocks/private/person.asp?personId=118791914&privcapId=167704202&previousCapId=183025473&previousTitle=Plaintiff%2520Funding%2520Corporation>.
10. **Exhibit 14 – Article dated November 15, 2010 regarding the charter to establish Esquire Bank.** This NY Times article is referenced on Law Cash’s website at this address, <https://www.lawcash.net/lawcash-esquire-bank-featured-new-york-times-article/>. The actual article is referenced at the following website,
<https://query.nytimes.com/gst/fullpage.html?res=9504E2D9123AF936A25752C1A9669D8B63&pagewanted=all>.
11. **Exhibit 15 – Page 106 from the Esquire Bank Prospectus.** The complete prospectus can be found on the following website,
<https://www.sec.gov/Archives/edgar/data/1531031/000157104917006282/t1701977-424b4.htm>.
12. **Exhibit 16 - New York State Department of State, Entity Information for the following entities:**
 1. **Plaintiff Funding Holding, Inc.;**
 2. **Plaintiff Holding V, LLC;**
 3. **LawCash I, LLC;**

4. **Plaintiff Funding Corporation;**
5. **Plaintiff Funding Corporation (Dennis Shields);**
6. **Plaintiff Funding Corporation (Harvey Hirschfeld);**

13. The Entity information for each of these entities was obtained by going on to the website maintained by the New York State, Division of Corporations, https://appext20.dos.ny.gov/corp_public/CORPSEARCH.ENTITY_SEARCH_ENTRY, and entering the various entity names. The entity information is a true and accurate copy of the documents obtained from this website.

I, Raul J. Sloezen, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 7th day of December, 2017.

Dated: December 7, 2017



Raul J. Sloezen, Esq.